

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION (CLEVELAND)

**VIRGINIA BARNES**, individually  
and on behalf of all similarly  
situated individuals,

Plaintiffs,  
vs.

**THE PROGRESSIVE CORPORATION;  
PROGRESSIVE NORTHERN  
INSURANCE COMPANY; DRIVE  
INSURANCE HOLDINGS, INC; and  
DOES 1-10.**

Defendants.

Case No. 1:17-cv-00865

Hon. Patricia A. Gaughan

**MOTION TO ADMIT JACOB R. RUSCH  
PRO HAC VICE**

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**MOTION FOR ADMISSION OF JACOB R. RUSCH  
PRO HAC VICE**

Pursuant to N.D. Ohio Civ. R. 83.5(h), Mark M. Abramowitz, attorney for Plaintiff, Virginia Barnes, in the above-captioned action, hereby moves the Court to admit Jacob R. Rusch *pro hac vice* to appear and participate as counsel or co-counsel in this case for Plaintiff, and in support of his motion, states as follows:

1. Mr. Rusch has been a member of the bar of the State of Minnesota since May 6, 2011.
2. Mr. Rusch is and has been a member in good standing of the bar of the United States District Court, District of Minnesota since August 22, 2012.
3. Mr. Rusch is and has been a member in good standing of the bar of the United States District Court, Central District of Illinois since April 17, 2017.
4. Mr. Rusch is a member in good standing in every jurisdiction in which he is

admitted to practice.

5. There are no disciplinary proceedings pending against Mr. Rusch as a member of any bar in any jurisdiction.
6. Mr. Rusch is familiar with the Local Rules of the United States District Court for the Northern District of Ohio.
7. In further support of this motion, Mr. Rusch has submitted herewith his Certificate of Good Standing. *See* Exhibit A.
8. Mr. Rusch is already registered for electronic filing with this court.
9. Mr. Rusch's relevant identifying information is as follow:

Jacob R. Rusch, Esq.  
Johnson Becker, PLLC  
444 Cedar Street, Suite 1800  
Saint Paul, MN 55101  
Telephone No.: (612) 436-1800  
Fax No.: (612) 436-1801  
E-mail: [jrusch@johnsonbecker.com](mailto:jrusch@johnsonbecker.com)

WHEREFORE, the undersigned counsel respectfully moves this Court to admit Jacob R. Rusch, *pro hac vice*.

DATE: May 1, 2017

Respectfully Submitted,

/s/Mark M. Abramowitz  
Mark M. Abramowitz (0088145)  
Mark A. DiCello (0063924)  
**DiCELLO LEVITT AND CASEY**  
7556 Mentor Ave.  
Mentor, Ohio 44060  
Telephone: (440) 953-8888  
Fax: (440) 953-9138  
mabramowitz@dlcfirm.com  
madicello@dlcfirm.com  
*Local Counsel for Plaintiff*

Jacob R. Rusch (MN Bar No. 391892)\*  
Molly E. Nephew (MN Bar No. 397607)\*  
*\*Pro Hac Anticipated*  
**JOHNSON BECKER, PLLC**  
444 Cedar Street, Suite 1800  
Saint Paul, Minnesota 55101  
Telephone: (612) 436-1800  
Fax: (612) 436-1801  
jrusch@johnsonbecker.com  
mnephew@johnsonbecker.com  
*Trial Attorneys for Plaintiff*